REMARKS

Claims 1-9 were examined and reported in the Office Action. Claims 1-9 are rejected. Claims 7-9 are canceled. Claims 1-6 are amended. Applicant's amended claims are fully supported in the original filed application (see Fig. 18, pages 4 and 8). No new matter is added. Claims 1-6 remain.

Applicant requests reconsideration of the application in view of the following remarks.

I. <u>35 U.S.C. § 102</u>

A. It is asserted in the Office Action that claims 1-9 are rejected in the Office Action under 35 U.S.C. § 102(b), as being anticipated by U.S. Patent No. 5,648,793, issued to Chen ("<u>Chen</u>"). Applicant respectfully traverses the aforementioned rejection for the following reasons.

According to MPEP 2131, "'[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.' (Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). 'The identical invention must be shown in as complete detail as is contained in the ... claim.' (Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)). The elements must be arranged as required by the claim, but this is not an ipsissimis verbis test, i.e., identity of terminology is not required. (In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990))."

Applicant's amended claim 1 contains the limitations of "[a] method for driving an LCD, comprising providing an LCD with a plurality of columns, a plurality of rows, and a plurality of pixels and by driving the LCD by a multiple pixel inversion technique comprising: applying signals of a same polarity to an $n \times m$ pixel matrix where (n) is an integer from two to a number of scan lines and (m) is an integer from two to a number of column lines, the applied signals to provide a reduced total fringe field effect to maintain contrast and to minimize display flickering."

Applicant's claimed invention includes a method for driving a LCD by signals of the same polarities in two or more adjacent columns, rows or pixels. The driving method is illustrated in Applicant's Figures 16 to 18. With the <u>multiple pixel inversion</u> method and by applying signals of the same polarity to two or more adjacent elements selected from the group column, row and pixel, flickering in the fringe field effect observed in LCD's is overcome.

Chen discloses a method for driving a LCD including individual inversion of alternate rows and a similar individual inversion method to effect dot inversion. Further, Chen describes the inversion of one field or one dot at a time. Chen, however, does not teach, disclose or suggest multiple pixel inversion is applied. The Office Action relies on Figure 5 of Chen. Figure 5 of Chen, however, relates to column inversion and not to multiple pixel inversion.

Further, Chen does not teach, disclose or suggest that a multiple pixel inversion is effected in pixel groupings ($n \times m$ pixel inversion) as asserted in claim 1. Moreover, Chen does not teach, disclose or suggest deficiencies with the techniques of column and row inversion that would lead one skilled in the art of LCDs to seek and investigate a different type of inversion. It should be noted that certain alternatives are disclosed in Chen (see, Chen, column 4, lines 26 - 31). These alternatives, however, relate to the duration of the driving pulses and do not teach, suggest or disclose Applicant's driving method.

Therefore, since Chen does not disclose, teach or suggest all of Applicant's amended claim 1 limitations, Applicant respectfully asserts that a *prima facie* rejection under 35 U.S.C. § 102(b) has not been adequately set forth relative to Chen. Thus, Applicant's amended claim 1 is not anticipated by Chen. Additionally, the claims that depend directly or indirectly on claim 1, namely claims 2 -6, are also not anticipated by Chen for the above same reason.

Accordingly, withdrawal of the 35 U.S.C. § 102(b), rejections for claims 1-9 is respectfully requested.

B. It is asserted in the Office Action that claim 1 is rejected in the Office Action under 35 U.S.C. § 102(e), as being anticipated by U.S. Patent No. 6,496,172, issued to

Hirakata ("Hirakata"). Applicant respectfully traverses the aforementioned rejection for the following reasons.

Hirakata discloses a driving method for LCDs. Hirakata describes multiple inversion of columns or rows. (Hirakata, Figures 17a and 17b). Hirakata, however, does not teach, disclose or suggest "[a] method for driving an LCD, … by a multiple pixel inversion technique comprising: applying signals of a same polarity to an $n \times m$ pixel matrix where (n) is an integer from two to a number of scan lines and (m) is an integer from two to a number of column lines, the applied signals to provide a reduced total fringe field effect to maintain contrast and to minimize display flickering."

Therefore, since Hirakata does not disclose, teach or suggest all of Applicant's amended claim 1 limitations, Applicant respectfully asserts that a *prima facie* rejection under 35 U.S.C. § 102(e) has not been adequately set forth relative to Hirakata. Thus, Applicant's amended claim 1 is not anticipated by Hirakata.

Accordingly, withdrawal of the 35 U.S.C. § 102(e), rejection for claim 1 is respectfully requested.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending, namely 1-6, patentably define the subject invention over the prior art of record and are in condition for allowance and such action is earnestly solicited at the earliest possible date.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

PETITION FOR EXTENSION OF TIME

Per 37 C.F.R. 1.136(a) and in connection with the Final Office Action mailed on August 11, 2004, Applicant respectfully petitions the Commissioner for a three (3) month extension of time, extending the period for response to February 11, 2005. The Commissioner is hereby authorized to charge payment to Deposit Account No. 02-2666 in the amount of \$1,020.00 to cover the petition filing fee for a 37 C.F.R. 1.17(a)(3) large entity. A duplicate copy of the fee transmittal is enclosed.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR, & ZAFMAN

Dated: February 11, 2005

Steven Laut, Reg. No. 47,736

12400 Wilshire Boulevard Seventh Floor Los Angeles, California 90025 (310) 207-3800 **CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail with sufficient postage in an envelope addressed to: Mail Stop A/F, Commissioner for Patents, P. O. Box 1450, Alexandria, Virginia 22313-1450 on February 11, 2005.

Jean Svoboda